

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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TZVI WEISS, *et al.*, : CV 05-4622 (CPS) (KAM)  
Plaintiffs, :  
-against- : **DECLARATION OF LAWRENCE B.**  
NATIONAL WESTMINSTER, PLC, : **FRIEDMAN IN SUPPORT OF**  
Defendant. : **DEFENDANT'S MOTION TO DISMISS**  
: **THE FIRST AMENDED COMPLAINT**  
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Lawrence B. Friedman declares as follows:

1. I am a member of the Bars of the State of New York and of this Court and of the law firm of Cleary Gottlieb Steen & Hamilton LLP, attorneys for defendant National

Westminster Bank Plc (“NatWest”) in the above-captioned matter. I make this declaration in support of NatWest’s motion to dismiss plaintiffs’ first amended complaint.

2. Attached as Exhibit A is a true and correct copy of the indictment of the Holy Land Foundation for Relief and Development Fund, filed in the United States District Court for the Northern District of Texas Dallas Division, July 26, 2004, which is referred to in the First Amended Complaint in this matter at paragraph 351, n.10.

3. Attached as Exhibit B is a true and correct copy of Julian Borger, Close Trust, Israel Pleads; Britain is being asked to clamp down on Palestinian fundraisers, The Guardian, dated August 7, 1997.

4. Attached as Exhibit C is a true and correct copy of the U.K. Charity Commission Report, dated September 24, 2003.

5. Attached as Exhibit D is a true and correct copy of an extract from the U.K. Charity Commission Annual Report of 1996.

6. Attached as Exhibit E is a true and correct copy of Jeevan Vasagar, 'Hamas-linked' relief funds frozen – British Muslims furious over charity commission's decision to follow US in closing accounts of the UK-based Interpal, The Guardian, dated August 28, 2003.

7. Attached as Exhibit F is a true and correct copy of the U.K. Charity Commission Order freezing Interpal's accounts held at NatWest, dated August 26, 2003.

8. Attached as Exhibit G is a true and correct copy of the U.K. Charity Commission Order unfreezing Interpal's accounts held at NatWest, dated September 24, 2003.

9. Attached as Exhibit H is a true and correct copy of the indictment of the Holy Land Foundation for Relief and Development Fund, filed in the United States District Court for the Northern District of Texas Dallas Division, November 30, 2005, which is quoted in the First Amended Complaint in this matter at paragraphs 394 and 398.

10. Attached as Exhibit I is a true and correct copy of Executive Order No. 13224 published at 66 Federal Registrar 49,079 on September 25, 2001.

11. Attached as Exhibit J is a true and correct copy of The Federal Reserve Board Structure Data Report For U.S. Offices Of Foreign Banks, as of September 30, 2005.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Lawrence B. Friedman  
Lawrence B. Friedman

Dated: January 26, 2006  
New York, New York